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May 23, 2023

BY CM/ECF AND EMAIL

Hon. Analisa Torres,  
United States District Court,  
Southern District of New York,  
Daniel Patrick Moynihan U.S. Courthouse,  
500 Pearl Street,  
New York, NY 10007-1312.

Re: *Contrarian Capital Management LLC, et al. v. Bolivarian Republic of Venezuela*,  
19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 18 Civ. 11940 and 19 Civ. 03123)

Dear Judge Torres:

We write in response to certain statements in Plaintiffs' May 16, 2023 letter regarding this long-concluded action. As we have twice advised Plaintiffs' counsel, on March 31 and April 27, 2023 (*see* Exhibit A), this firm no longer represents Defendant the Bolivarian Republic of Venezuela in connection with this action. Plaintiffs nonetheless suggest in their letter that Sullivan & Cromwell may in fact still represent the Republic because the firm "has not to date sought leave to withdraw its appearance in this case." But a judgment was entered in this action on October 16, 2020, and the case was closed on the docket on May 24, 2021. Accordingly, unlike other actions pending in other courts from which this firm has recently moved to withdraw as counsel to the Republic, there was and is no pending action from which to withdraw here.

Plaintiffs also assert in their letter that they have recently "proposed a stipulation" to us regarding a supplemental complaint. That is inaccurate. The entirety of our recent correspondence with Plaintiffs' counsel is attached as Exhibit A to this letter. Plaintiffs' counsel have made no such proposal to us, nor would it have made sense for them to do so, given that we no longer represent the Republic and thus could not have agreed to accept or waive service of any complaint that Plaintiffs may now wish to file.

Hon. Analisa Torres

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Respectfully submitted,

/s/ Judson O. Littleton

Judson O. Littleton